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December 10, 1999

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**VIA COURIER**

Federal Communications Commission  
1270 Fairfield Rd.  
Gettysburg, PA 17325-7245

**Re: Intek License Acquisition Corporation's Filing of an Updated FCC Form 602  
(Ownership Disclosure Information for Wireless Telecommunications  
Services)**

Dear Sir/Madam:

Transmitted herewith, on behalf of Intek License Acquisition Corp. ("ILAC") is an original and one copy of an updated FCC Form 602 ownership report with associated exhibits to be filed with the Commission. Please date stamp the enclosed copy and return in the self addressed stamped envelope provided herein.

Should the Commission have any questions relative to the instant application, please contact Douglas L. Povich at (202) 626-6674.

Respectfully submitted,



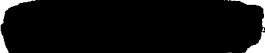
Douglas L. Povich

Enclosure



*Bratislava . Brussels . Budapest . Cleveland . Columbus . Hong Kong . Houston  
Jacksonville . Kyiv . London . Madrid . Miami . Moscow . New York . Phoenix . Prague . Taipei*

Applicant/Licensee Information

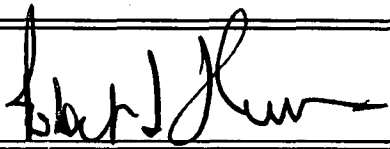
1) First Name (if individual):	MI:	Last Name:	Suffix:
2) Applicant Name (if entity): Intek License Acquisition Corporation		3) Applicant TIN: 	

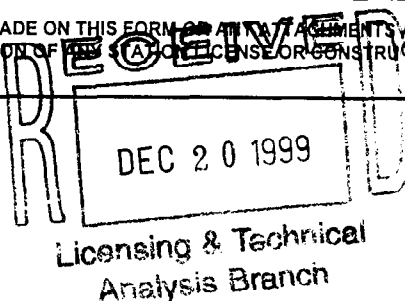
Related FCC Regulated Businesses of Applicant/Licensee

4a) Name and address of all FCC Regulated Businesses owned by Applicant/Licensee (use additional sheets, if necessary):	4b) Principal Business:	4c) TIN:	4d) Percent of Interest Held:

Signature

5) Typed or Printed Name of Party Authorized to Sign

First Name: Robert	MI: J.	Last Name: Shiver	suffix:
Title: President			
Signature: 			Date: 12/10/99
Failure To Sign This Application May Result In Dismissal Of The Application And Forfeiture Of Any Fees Paid			
WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).			



FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services

Schedule for Disclosable Interest Holders

Approved by OMB  
3060-0799  
See instructions for  
public burden estimate

**Disclosable Interest Holder Information** (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if Individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if entity): Securicor Wireless Holdings, Inc.		3) Disclosable Interest Holder's TIN:	
4) Disclosable Interest Holder's Address: 99 Park Avenue, 18th Floor, New York, NY 10016			
5) Type of Interest in Applicant ( D ) (refer to Instructions for list)	6) Disclosable Interest Holder is a(n): ( C ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant:  100%	
8) Disclosable interest Holders Type of Ownership (refer to Instructions for list): C Common Stock with voting rights		9) Disclosable Interest Holder's Country of Citizenship:  United States	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): Intek License Acquisition Corporation ("ILAC") is a wholly-owned subsidiary of Securicor Wireless Holdings, Inc (Securicor Wireless).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	11b) Principal Business:	11c) TIN:	11d) Percent of interest Held:
Roamer One, Inc.	See Exhibit 1		100%
Midland USA, Inc.	See Exhibit 1		100%
Intek License Acquisition Corp.	See Exhibit 1		100%

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Schedule for Disclosable Interest Holders

Disclosable Interest Holder Information (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if Individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holders Name (if-entity): Securicor US Holdings, Inc.		3) Disclosable Interest Holder's TIN: [REDACTED]	
4) Disclosable Interest Holder's Address: C/O C. Grice McMullan, Thompson & McMullan P.C., 100 Shockoe Slip, Richmond, VA 23219			
5) Type of Interest in Applicant ( I ) (refer to Instructions for list)	6) Disclosable Interest Holder is a(n) ( C ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant:  100%	
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): Common Stock with voting rights		9) Disclosable Interest Holder's Country of Citizenship:  United States	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): Securicor Wireless Holdings, Inc. ("Securicor Wireless") is a wholly-owned subsidiary of Securicor US Holdings, Inc. (See Exhibit 3)			

Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)

11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	11b) Principal Business:	11c) TIN:	11d) Percent of Interest Held:
Securicor Wireless	See Exhibit 2	[REDACTED]	100%
Roamer One, Inc.	See Exhibit 1	[REDACTED]	100%
Midland USA, Inc.	See Exhibit 1	[REDACTED]	100%
Intek License Acquisition Corp.	See Exhibit 1	[REDACTED]	100%

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Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information** (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):		MI:	Last Name:		Suffix:
2) Disclosable Interest Holder's Name (if entity): Securicor Communications, Ltd.				3) Disclosable Interest Holder's TIN: [REDACTED]	
4) Disclosable Interest Holder's Address: Sutton Park House, 15 Carshalton Pd., Sutton, Surrey, SM14LD UK					
5) Type of Interest in Applicant ( <input checked="" type="checkbox"/> ) (refer to Instructions for list)		6) Disclosable Interest Holder is a(n): ( <input checked="" type="checkbox"/> ) (refer to instructions for list of codes):		7) Percent of Interest Held in Applicant:  100%	
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list):  Common Stock with voting rights			9) Disclosable Interest Holder's Country of Citizenship:  United Kingdom		
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant):  Securicor US Holdings, Inc. is a wholly-owned subsidiary of Securicor Communications, Ltd. (See Exhibit 3).					

**Related FCC Regulated Businesses of Disclosable Interest Holders** (repeat for each interest holder identified)

11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	11b) Principal Business:	11c) TIN:	11d) Percent of Interest Held:
See Exhibits 1 and 2		[REDACTED]	
		[REDACTED]	
		[REDACTED]	
		[REDACTED]	

FCC Ownership Disclosure Information for the  
Wireless Telecommunications Services

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3060-0799  
See instructions for  
public burden estimate

Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information** (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if Individual):	MI:	Last Name:	suffix:
2) Disclosable Interest Holder's <b>Name</b> (if entity): Security Services PLC		3) Disclosable Interest Holder's TIN: N/A	
4) Disclosable Interest Holders Address: Sutton Park House, 15 Carshalton Rd., Sutton, Surrey, SM14LD UK			
5) Type of Interest in Applicant ( I ) (refer to Instructions for list)	6) Disclosable Interest Holder is a(n): ( C ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 100%	
8) Disclosable Interest Holder's Type of Ownership (refer to instructions for list): Ordinary shares with voting rights		9) Disclosable Interest Holder's Country of Citizenship: United Kingdom	
10) Relationship Description (if the disclosable interest holder is an indirect owner, list path of ownership from indirect owner to the applicant): Securicor Cmunications, Ltd. is a wholly-owned Subsidiary of Security Services PLC. (See Exhibit 3).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

11a) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	11b) Principal Business:	11c) TIN:	11d) Percent of Interest Held:
See Exhibits 1 and 2			

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Wireless Telecommunications Services

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Schedule for Disclosable Interest Holders

**Disclosable Interest Holder Information** (complete as many as required to describe all disclosable interest holders)

1) Disclosable Interest Holder's First Name (if individual):	MI:	Last Name:	Suffix:
2) Disclosable Interest Holder's Name (if-entity): Securicor PLC		3) Disclosable Interest Holder's TIN: N/A	
4) Disclosable Interest Holder's Address: Sutton Park House, 15 Marshilton Rd., Sutton, Surrey, SM14LD, UK			
5) Type of Interest in Applicant ( I ) (refer to Instructions for list)	6) Disclosable Interest Holder is a(n): ( C ) (refer to instructions for list of codes):	7) Percent of Interest Held in Applicant: 100%	
8) Disclosable Interest Holders Type of Ownership (refer to instructions for list): ordinary 1 pound shares with voting rights		9) Disclosable Interest Holder's Country of Citizenship: United Kingdom	
10) Relationship Description (if the disclosable interest holder is an Indirect owner, list path of ownership from indirect owner to the applicant): Securicor PLC wholly owns Security Services PLC; Security Services PLC wholly owns Securicor Communications, Ltd., Securicor Communications Ltd. wholly owns Securicor US Holdings, Inc. (See Exhibit 3).			

**Related FCC Regulated Businesses of Disclosable Interest Holders (repeat for each interest holder identified)**

IIa) Name and address of all FCC Regulated Businesses owned by Disclosable Interest Holder listed in #3 (use additional sheets, if necessary):	IIb) Principal Business:	1 Ic) TIN:	II d) Percent of Interest Held:
See Exhibits 1 and 2			

**Exhibit 1**

**Response to items 11a and 11 b, FCC Form 602 Schedule A**

Roamer One, Inc.  
1690 North Topping Avenue  
Kansas City, MO 64120

Roamer One, Inc. owns and operates Private Mobile Radio Services ("PMRS") stations in the 220-222 MHz frequency band and manages systems on behalf of other licensees in that band,

Midland USA, Inc.  
1690 North Topping Avenue

Midland USA, Inc. distributes land mobile products and equipment including equipment operating in the 220-222 MHz band.

24372 Vanowen St., Suite 206

Intek License Acquisition Corp., is a company established to participate in Federal



**Exhibit 2**

**Response to items IIa and IIb, FCC Form 602 Schedule A**

Securicor Wireless Holdings, Inc.  
99 Park Avenue  
18<sup>th</sup> Floor  
New York, NY 100 16

Securicor Wireless Holdings, Inc. (Securicor Wireless) (formerly Intek Global Corp.), through its wholly-owned subsidiaries, is a nationwide provider of mobile radio equipment and services authorized pursuant to Part 90 of the FCC's rules.

## Exhibit 3

### Response to Item 10, FCC Form 602 Schedule A

The applicant in the instant FCC Form 602 is Intek License Acquisition Corp. ("ILAC"). ILAC is a wholly-owned subsidiary of Securicor Wireless Holdings, Inc. (formerly known as Intek Global Corp.), a Delaware corporation with headquarters at 99 Park Avenue, 18<sup>th</sup> Floor, New York, New York 100 16.

#### ILAC's Ownership Structure

ILAC is a wholly-owned subsidiary of Securicor Wireless Holdings, Inc. (Securicor Wireless), a Delaware corporation with headquarters at 99 Park Avenue, 18<sup>th</sup> Floor, New York, New York 10016. Securicor Wireless is, in turn, is a wholly owned subsidiary of Securicor US Holdings, Inc, a Delaware corporation. Securicor US Holdings, Inc. is in turn a wholly owned subsidiary of Securicor Communications, Ltd., a corporation organized under the laws of England and Wales with offices at Sutton Park House, 15 Carshalton Road, Sutton, Surrey SM1 4LD, United Kingdom. Securicor Communications, Ltd., is in turn, a wholly-owned subsidiary of Security Services plc, with offices at Sutton Park House, 15 Carshalton Road, Sutton, Surrey SM1 4LD, United Kingdom. Security Services plc, is in turn, a wholly-owned subsidiary of Securicor plc (Securicor) a publicly-traded corporation also organized under the laws of England and Wales, with headquarters at Sutton Park House, 15 Carshalton Road, Sutton, Surrey SM1 4LD, United Kingdom. Securicor is 100% publicly owned, with no single entity having a 10% or greater ownership interest. Accordingly, Securicor, through the intervening wholly-owned subsidiaries described above, holds a 100% interest in Securicor Wireless, which holds a 100% interest in ILAC.<sup>1</sup>

As a result of the *pro forma* transaction described below, ILAC remains a wholly subsidiary of Securicor Wireless Holdings, Inc. In turn, Securicor Wireless Holdings, Inc. remains a wholly-owned subsidiary, through intervening wholly-owned corporations, of Securicor plc.

#### The Pro *Forma* Corporate Restructuring of Securicor

Prior to November 10, 1999, Securicor was a minority shareholder in BT Cellnet with limited rights and a minority of Board votes under an existing joint venture agreement with British Telecommunications (BT). In order to sell its interest in the Cellnet asset to BT,

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<sup>1</sup> On November 22, 1999, fifteen days after the release of the Commission's *Public Notice*, the Commission granted Securicor Wireless Holdings, Inc.'s Supplemental Declaratory Ruling to allow for ILAC's 100% indirect foreign ownership. See Public Notice, "Section 3.1 O(B)(4) Requests," Report No. TEL-001 56S, 1999 Lexis 5587 (rel. Nov. 5, 1999).

Securicor restructured its corporate organization. **The shareholder base of Securicor, however, remained constant during the entire transaction. Under the restructuring, shareholders in Securicor received the same equity in the same proportion in the newly restructured company.** Securicor shareholders also received a dividend from the proceeds of the sale of Cellnet.

On November 10, 1999, Securicor sold its share of BT Cellnet. The sale of this asset warranted a restructuring of Securicor's corporate organization. Specifically, the restructuring was accomplished by canceling all issued Securicor shares and issuing new shares of the aggregate nominal amount to BT Cellnet Holdings, a newly-formed company. BT Cellnet Holdings issued two classes of shares with "A" shares being issued to new Securicor and "B" shares being issued to former shareholders of Securicor. The new Securicor then issued new shares to each of Securicor's former shareholders. Thus, under the restructuring Securicor shareholders were allotted "B" shares in BT Cellnet Holdings and ordinary shares in new Securicor. The "B" shares in BT Cellnet Holdings were then transferred to BT in return for the BT Cellnet Consideration. The new Securicor shares were retained by shareholders and represented their ongoing investment in the company.

In the second step of the transaction, BT Cellnet Holdings borrowed a sum of money to be used by the Securicor Group as development capital post-restructuring. BT Cellnet subscribed the sum borrowed for additional shares in Securicor plc and such sum was, in turn, passed down to Security Services, plc (a wholly owned subsidiary of Securicor). Subsequently, in the third stage of the scheme, Security Services distributed its beneficial interest in Cellnet to Securicor by way of a dividend *in specie*. Securicor plc then distributed this beneficial interest in Cellnet to BT Cellnet Holdings also by way of dividend *in specie*. Next, and pursuant to a Court-approved reduction in capital, the BT Cellnet Holdings "A" shares held by new Securicor were cancelled and the entire issued share capital of Securicor transferred to new Securicor. Following this reduction in capital, BT Cellnet Holdings had in issue only the "B" shares held by shareholders. The only material asset of BT Cellnet Holding was the BT Cellnet stake. BT then called for the exercise of the put or call options over the BT Cellnet Holdings "B" shares and acquire those shares upon payment of the BT Cellnet Consideration. BT also refinanced the debt owed by BT Cellnet Holdings for the development finance. The new Securicor shares were then listed on the London Stock exchange.

Notably, under this transaction BT's options could only be exercised when BT Cellnet Holdings fell out of the ownership chain of Securicor and BT Cellnet Holdings became a wholly owned subsidiary of BT. Further, BT's shares provided it only with limited rights that were related strictly to the Cellnet asset.

The proposal did not involve any changes in the management of Securicor's Managed Businesses, including, ILAC, its wholly owned U.S. corporation which is an FCC licensee. The Board of Securicor remained the same after the restructuring and sale. Thus, with the exception of the sale of the Cellnet asset, the ownership of Securicor remains unchanged.

**OWNERSHIP STRUCTURE CHART**

